

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARLIN M. ADAMS, Chapter 11 Trustee of
the Post-Confirmation Bankruptcy Estates of
CORAM HEALTHCARE CORPORATION,
a Delaware Corporation, and of CORAM,
INC., a Delaware Corporation,

Plaintiff,

v.

DANIEL D. CROWLEY

Defendant

Case No. 04-1565 (SLR)

***AMENDED JOINT MOTION FOR EXTENSION OF CERTAIN DEADLINES
CONTAINED IN THE COURT'S APRIL 25, 2006 SCHEDULING ORDER***

Pursuant to Local Rule 16.5, the parties, through counsel, hereby respectfully move this Court for an Order amending the current Scheduling Order dated April 25, 2006 (docket no. 70) to extend certain deadlines.

This Joint Motion is based on the following grounds:

1. The parties are involved in related litigation in the District of Colorado, in which dispositive motions have been filed, or will be filed later this month, which may affect this action.
2. Counsel for Defendant Daniel D. Crowley are working diligently to review and synthesize the large quantity of documents produced in discovery in this case and to obtain through service of process and to schedule the depositions of many third-party witnesses.
3. Counsel for Arlin M. Adams, Chapter 11 Trustee of the Post-Confirmation Bankruptcy Estates of Coram Healthcare Corporation, a Delaware corporation, and of Coram, Inc., a Delaware corporation, are working diligently to respond to the requests for production and interrogatories by Mr. Crowley served on October 10 and October 17 respectively.

4. Accordingly, the parties have agreed that it is in their mutual interest, and in the interest of efficiency, judicial economy, and justice, to extend certain deadlines set forth in this Court's April 25, 2006 Order as follows:

- a) All fact discovery shall be completed by **March 23, 2007**.
- b) Reports from retained experts under Rule 26(a)(2) on issues for which any party has the burden of proof due by **May 25, 2007**. Rebuttal expert reports due by **June 22, 2007**. Depositions of such experts to be completed on or before **July 13, 2007**.

5. The parties further agree that Plaintiff's responses to the aforementioned discovery requests shall be served on or before **December 8, 2006**.

6. The parties respectfully request that all other dates set pursuant to the Order dated April 25, 2006 remain the same, including that summary judgment motions shall be served and filed no later than **April 17, 2007** and that the jury trial in this matter is scheduled to commence on **September 17, 2007**.

7. **Local Rule 16.5 Certification:** Undersigned counsel certify that they have sent a copy of this Joint Motion to their respective clients.

Dated: November 14, 2006

/s/ Christina M. Thompson

JEFFREY WISLER (#2795)
CHRISTINA M. THOMPSON (#3976)
CONNOLLY BOVE LODGE & HUTZ LLP
The Nemours Building
1007 N. Orange Street
P.O. Box 2207
Wilmington, DE 19899
Telephone: (302) 658-9141
Facsimile: (302) 658-0380
Email: jwisler@cblh.com
Email: cthompson@cblh.com

ELLIOT R. PETERS
LAURIE CARR MIMS
KEKER & VAN NEST, LLP
710 Sansome Street
San Francisco, CA 94111-1704
Telephone: (415) 391-5400
Facsimile: (415) 397-7188
Email: epeters@kvn.com
Email: lmims@kvn.com

Attorneys for Defendant
DANIEL D. CROWLEY

Dated: November 14, 2006

/s/ Richard A. Barkasy

RICHARD A. BARKASY (#4683)

MICHAEL J. BARRIE (#4684)

SCHNADER HARRISON SEGAL & LEWIS LLP

824 N. Market Street, Suite 1001

Wilmington, DE 19801

Telephone: (302) 888-4554

Email: rbarkasy@schnader.com

Email: mbarrie@schnader.com

BARRY E. BRESSLER

WILBUR L. KIPNES

JENNIFER NESTLE

SCHNADER HARRISON SEGAL & LEWIS LLP

1600 Market Street, Suite 3600

Philadelphia, PA 19103

Telephone: (215) 751-2000

Facsimile: (215) 751-2205

Email: bbressler@schnader.com

Email: wkipnes@schnader.com

Email: jnestle@schnader.com

Attorneys for Plaintiff

ARLIN M. ADAMS, Chapter 11 Trustee